



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

AHT
F.#2011R02050

271 Cadman Plaza East
Brooklyn, New York 11201

July 2, 2012

By ECF

The Honorable Carol B. Amon
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

The Honorable Sandra L. Townes
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Nicholas Santora
Criminal Docket No. 06-800 (SLT)

United States v. Nicholas Santora
Criminal Docket No. 12-50 (CBA)

Dear Chief Judge Amon and Judge Townes:

The government respectfully submits this letter in connection with the above-captioned cases.

On February 7, 2007, Nicholas Santora (the "defendant") was arrested and charged with Racketeering, in violation of Title 18, United States Code, Section 1962. See United States v. Santora, 06-Cr-800 (SLT). The defendant pleaded guilty and was sentenced to 36 months' incarceration and three years' supervised release on November 11, 2008.

On January 27, 2012, the defendant was arrested and charged with RICO Conspiracy, in violation of Title 18, United States Code, Section 1962(d). See United States v. Santora, 12-Cr-50 (CBA). The defendant was charged with predicate acts of

extortion, marijuana distribution and illegal gambling.¹

On March 14, 2012, the United States Department of Probation filed a Violation of Supervised Release (the "VOSR") in connection with the defendant's 2006 case. The VOSR charged the defendant for engaging in new criminal conduct and associating with known members of organized crime groups.

The parties are currently conducting plea negotiations with respect to the superseding indictment and the VOSR and have agreed that both parties would benefit from an agreement that resolved both cases simultaneously. Accordingly, the parties respectfully request that a single District Court Judge preside over the potential guilty plea to charges related to superseding indictment and the VOSR.

Respectfully submitted,

LORETTA E. LYNCH
United States Attorney

By: _____/s/_____
Amir H. Toossi
Assistant U.S. Attorney
(718) 254-6176

cc: Richard Rehbock, Esq. (by ECF)

¹ On May 1, 2012, the defendant was charged in a superseding indictment ("S-6") with additional predicate acts of extortion and illegal gambling.